

EXHIBIT C

Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 IN RE: SOCIAL MEDIA) CASE NO. 4:22-MD-03047-YGR
4 ADOLESCENT)
5 ADDICTION/PERSONAL) MDL No. 3047
6 INJURY PRODUCTS)
7 LIABILITY LITIGATION)
8 _____)
9 THIS DOCUMENT RELATES)
10 TO:)
11 Jordan School District)
12 v. Meta Platforms Inc,)
13 et al.)
14 Case No. 4:24-cv-1377)
15 _____)

11 Thursday, April 17, 2025

12 Video-Recorded Oral 30(b)(6) Deposition
13 of Jordan School District, by and through its
14 representative MICHAEL V. ANDERSON, held at
15 the offices of Kirkland & Ellis, 95 State
16 Street, Salt Lake City, Utah, commencing at
17 12:49 p.m. MDT on the above date, before
18 Debra A. Dibble, Fellow of the Academy of
19 Professional Reporters, Certified Court
20 Reporter, Registered Diplomate Reporter,
21 Certified Realtime Reporter.

22 _____
23 GOLKOW - VERITEXT
24 877.370.DEPS | fax 917.591.5672
25 deps@golkow.com

<p style="text-align: right;">Page 114</p> <p>1 considerations.</p> <p>2 Q. For all students, no matter</p> <p>3 what grade level, correct?</p> <p>4 A. Correct.</p> <p>5 Q. The board considered a</p> <p>6 global -- whether or not it should just do a</p> <p>7 global policy for all grades versus different</p> <p>8 policies for different grades, right?</p> <p>9 A. That's correct.</p> <p>10 Q. The board considered banning</p> <p>11 cell phones only in the classroom. Right?</p> <p>12 A. Yes.</p> <p>13 Q. And the board considered not</p> <p>14 issuing a district-wide policy at all and</p> <p>15 continue to allow schools to have their own</p> <p>16 policies. Fair?</p> <p>17 A. Yes.</p> <p>18 Q. And the board considered a</p> <p>19 policy that would require the students to</p> <p>20 store their phone during school hours, or at</p> <p>21 least during class time. That was discussed.</p> <p>22 A. That was an option discussed.</p> <p>23 Q. And the board received feedback</p> <p>24 on all those options. Fair?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Yes.</p> <p>2 Q. And some principals expressed</p> <p>3 to the board that they were not in favor of</p> <p>4 district-wide ban on phones from schools.</p> <p>5 Right?</p> <p>6 A. I'd have to go back and review</p> <p>7 if there was a principal that didn't</p> <p>8 want the --</p> <p>9 My -- the overwhelming majority</p> <p>10 of principals were in favor of a</p> <p>11 district-wide policy that prohibited phones.</p> <p>12 Q. But there were some principals</p> <p>13 that told board members that they were not in</p> <p>14 favor of district-wide policy because in</p> <p>15 their schools, the phones were not a problem,</p> <p>16 right?</p> <p>17 A. It's possible they had</p> <p>18 provisions in place already.</p> <p>19 MR. COWAN: Can we go to</p> <p>20 Tab 58, please?</p> <p>21 MR. DOUGLAS: What exhibit is</p> <p>22 this?</p> <p>23 MR. COWAN: We're going to mark</p> <p>24 this as Exhibit No. 15.</p> <p>25 (Whereupon, JSD-Anderson-15,</p>
<p style="text-align: right;">Page 115</p> <p>1 Q. The board based its decision on</p> <p>2 that feedback eventually. Fair?</p> <p>3 A. Yes.</p> <p>4 Q. And that feedback included</p> <p>5 feedback from teachers, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And that feedback included</p> <p>8 feedback from principals, right?</p> <p>9 A. Correct.</p> <p>10 Q. And assistant principals, yes?</p> <p>11 A. Yes.</p> <p>12 Q. Other school staff?</p> <p>13 A. Yes.</p> <p>14 Q. And administrators? Yes?</p> <p>15 A. Correct.</p> <p>16 Q. Parents? They got feedback</p> <p>17 from parents, quite a bit of it, right?</p> <p>18 A. Certainly.</p> <p>19 Q. And they got feedback from</p> <p>20 students, too?</p> <p>21 A. They did.</p> <p>22 Q. And some parents expressed to</p> <p>23 the board that they were against a</p> <p>24 district-wide ban on phones from schools.</p> <p>25 Correct?</p>	<p style="text-align: right;">Page 117</p> <p>1 Video, was marked for identification.)</p> <p>2 BY MR. COWAN:</p> <p>3 Q. Okay. Does this -- again, this</p> <p>4 looks familiar to you. This is the January</p> <p>5 2024 special meeting --</p> <p>6 A. Yes.</p> <p>7 Q. -- about the cell phone issues?</p> <p>8 A. Yes.</p> <p>9 Q. And who is the lady in the</p> <p>10 center, second from the left? Who is that?</p> <p>11 A. Is that where the mouse arrow</p> <p>12 is over right now?</p> <p>13 Q. Yes, sir?</p> <p>14 A. Yes, that's Board Member</p> <p>15 George.</p> <p>16 Q. What's her first name?</p> <p>17 A. Nidhi.</p> <p>18 Q. Nidhi George.</p> <p>19 Do you oftentimes refer to them</p> <p>20 as board member and then last name? That's</p> <p>21 how you refer to them?</p> <p>22 A. Sometimes.</p> <p>23 Q. Okay.</p> <p>24 A. Yeah.</p> <p>25 Q. I just didn't know if it was</p>

<p style="text-align: right;">Page 118</p> <p>1 like Congressman or something?</p> <p>2 A. No, just to be respectful on</p> <p>3 the record.</p> <p>4 Q. I gotcha.</p> <p>5 So that's Board Member George?</p> <p>6 A. Correct.</p> <p>7 Q. All right. So let's go to the</p> <p>8 first -- let's go back it up and make sure</p> <p>9 we're getting all of this.</p> <p>10 And let's play this and then</p> <p>11 I'll ask you some questions.</p> <p>12 [Video played]</p> <p>13 MR. COWAN: Okay. Stop this,</p> <p>14 please.</p> <p>15 BY MR. COWAN:</p> <p>16 Q. Did you hear at the end of that</p> <p>17 video where Board Member George, in the</p> <p>18 center, said that she had spoken to a</p> <p>19 principal in her community that she</p> <p>20 represents who had told her that a</p> <p>21 district-wide cell phone ban or policy was</p> <p>22 unnecessary because it wasn't a problem at</p> <p>23 his school?</p> <p>24 A. Yeah, I believe the words were:</p> <p>25 Leave it alone.</p>	<p style="text-align: right;">Page 120</p> <p>1 if the parents felt the same way.</p> <p>2 So it just lends it's -- it</p> <p>3 just illustrates how complex and how diverse</p> <p>4 the viewpoints are.</p> <p>5 Q. I appreciate that, sir,</p> <p>6 but that wasn't my question.</p> <p>7 MR. COWAN: I move to strike</p> <p>8 everything after "no."</p> <p>9 MR. DOUGLAS: You can move to</p> <p>10 strike, but just because you don't</p> <p>11 like his answer doesn't mean you move</p> <p>12 to strike --</p> <p>13 MR. COWAN: That's not a proper</p> <p>14 objection.</p> <p>15 MR. DOUGLAS: Well, neither is</p> <p>16 your motion to strike --</p> <p>17 MR. COWAN: Yes, it is, because</p> <p>18 if I object nonresponsive and I move</p> <p>19 to strike, that is exactly what I'm</p> <p>20 supposed to do under the rules if</p> <p>21 that's what I believe happened.</p> <p>22 MR. DOUGLAS: You're not liking</p> <p>23 the answer and that's why you're</p> <p>24 moving to strike.</p> <p>25 MR. COWAN: Okay. Thank you,</p>
<p style="text-align: right;">Page 119</p> <p>1 Q. And then, another board member</p> <p>2 chimed in at the end there. And I think it</p> <p>3 was -- and you can correct me if I'm wrong,</p> <p>4 the guy on the right-hand top corner board</p> <p>5 member in the center but furthest to the</p> <p>6 right. Do you recall that?</p> <p>7 A. Yes.</p> <p>8 Q. And what's that board member's</p> <p>9 name?</p> <p>10 A. That's Board Member Robinson.</p> <p>11 Q. And Board Member Robinson said:</p> <p>12 I talked to two others that said the same</p> <p>13 thing, in all intents and purposes. Right?</p> <p>14 A. That's correct.</p> <p>15 Q. So some district principals</p> <p>16 told board members that they were not in</p> <p>17 favor of a district phone policy at all</p> <p>18 because at their schools, phones were not a</p> <p>19 problem. Right?</p> <p>20 A. Yes. I think this conversation</p> <p>21 is -- it is representative of how complex the</p> <p>22 situation is. You'll also recall other board</p> <p>23 members chimed in in this conversation, and</p> <p>24 more or less said, well, I'll be interested</p> <p>25 to see if the teachers felt the same way, or</p>	<p style="text-align: right;">Page 121</p> <p>1 sir. I'd appreciate the commentary to</p> <p>2 stop.</p> <p>3 BY MR. COWAN:</p> <p>4 Q. And as we just saw, some of the</p> <p>5 board members in that video recognize</p> <p>6 benefits of having cell phones in classrooms</p> <p>7 to teach students how to deal with the</p> <p>8 regular distractions of life. Fair?</p> <p>9 A. Yes.</p> <p>10 Q. The board was going to look, as</p> <p>11 you said, it's a complex issue. They were</p> <p>12 looking at the pros and the cons of different</p> <p>13 options for a cell phone policy. Right?</p> <p>14 A. That's correct.</p> <p>15 Q. And the board had a survey.</p> <p>16 They -- after this meeting -- hired a company</p> <p>17 to go out and do a survey of parents and</p> <p>18 students and teachers concerning their</p> <p>19 thoughts on cell phone use. Right?</p> <p>20 A. That's correct.</p> <p>21 Q. And after that survey and</p> <p>22 further board meetings and looking at the</p> <p>23 pros and the cons, the board approved a</p> <p>24 policy concerning cell phones in</p> <p>25 September 2024, which became effective in</p>